

COREY R. AMUNDSON  
Chief, Public Integrity Section  
Criminal Division  
U.S. Department of Justice  
DAHOUD ASKAR  
Trial Attorney, Public Integrity Section  
1301 New York Ave. NW, 10th Fl.  
Washington, DC 20005  
202-368-1667  
Email: Dahoud.Askar@usdoj.gov  
ALEXANDER GOTTFRIED  
Trial Attorney, Public Integrity Section  
1301 New York Ave. NW, 10th Fl.  
Washington, DC 20005  
202-615-1286  
Email: Alexander.Gottfried@usdoj.gov  
*Attorneys for the United States*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHELE FIORE,

Defendant.

Case No. 2:24-cr-00155-JAD-DJA

**Government's Proposed Additional  
Jury Instruction**

The United States of America, by and through Corey Amundson, Chief, United States Department of Justice, Public Integrity Section, and Alexander Gottfried and Dahoud Askar, Trial Attorneys, hereby requests the proposed jury instruction, or, in the alternative, ask the Court to take judicial notice of the same under Federal Rule of Evidence 201:

Campaign accounts, political action committees, and charities are each subject to multiple state and federal laws. An individual can comply with one law while, at the same time, violate other laws, such as criminal laws prohibiting wire fraud.

DATED this 30th day of September, 2024

COREY R. AMUNDSON  
Chief, Public Integrity Section  
U.S. Department of Justice

/s/ Dahoud Askar  
Dahoud Askar and Alexander Gottfried  
Trial Attorneys